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May 27, 2003

Federal Communications Commission  
Office of the Secretary

Robert L. Pettit  
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John B. Muleta  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 3-C252  
Washington, D.C. 20554

WT Locket No.  
99-328

Dear Mr. Muleta:

On behalf of Nokia, Inc., this letter seeks clarification of the Nokia Order pertaining to compliance with the E911 call completion requirements of the Commission's rules. 47 C.F.R. § 22.921.<sup>1</sup> Nokia is in the process of preparing a training program that will focus on these requirements. The requested clarification is needed in order that the training program accurately reflects the requirements of the *Nokia Order*.

In the *Nokia Order* the Bureau adopted Nokia's request for "an alternate 911 call completion method for Nokia's multimode products, including both digital and analog transmission technologies."<sup>2</sup> In essence, the Bureau approved Nokia's proposal that "its multi-mode handsets will comply with the time limits for access attempts approved by the Commission for the A/B-IR method, specifically the 17 second-limit, whether the handset is operating in the digital or the analog mode."<sup>3</sup> The algorithm proposed by Nokia and approved by the Bureau treats a call as being successfully completed when the handset receives a voice or traffic channel assignment.

<sup>1</sup> The rule was adopted in the *Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, 14 FCC Rcd 10954 (1999) ("Second Report and Order"). The Second Report and Order delegated authority to the Bureau to approve additional 911 call processing methods. Nokia manufactures handsets pursuant to an order issued by the Bureau in January 2000. *911 Call Processing Modes*, 15 FCC Rcd 1911 (Wireless Telecom. Bur., 2000) ("Nokia Order").

<sup>2</sup> Nokia Order at para 2 (citation omitted).

<sup>3</sup> Nokia Order at para 5 (emphasis supplied; citation omitted).

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The proposed training program will include instruction on the following six core principles of compliance with the requirements of the *Nokia Order*:

- When a 911 call is dialed, the handset will attempt to complete the call on the "presently acquired system" which the handset utilizes for non-emergency calls.
- If the access attempts on the presently acquired system are not successful within 17 seconds (i.e., if the handset does not receive a voice or traffic channel assignment within that time limit), the handset will automatically attempt to make the call using the handset's preferred roaming list. (In an emergency mode this is sometimes referred to as the emergency scan list.)
- If access attempts on the preferred roaming list are unsuccessful, the handset will automatically attempt to complete the call on any and all additional systems on which it is capable of operating – whether analog or digital – regardless of the handset's programmed preferences.
- In the 911 mode, the handsets will provide effective feedback to the users – either an audible tone or message or a visual status report on the handset's screen.
- The initial access attempts on the "presently acquired system" must not exceed 17 seconds, regardless of whether the handset is operating in the digital or analog mode, before the handset attempts to call on another network.
- In 911 mode, if a digital or analog call is dropped (i.e., through a system failure), the next new emergency call is initiated on the next available system – whether that system is digital or analog.

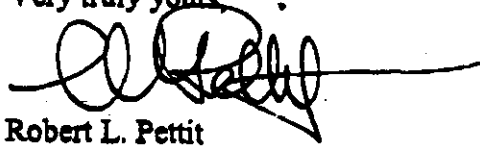
Nokia seeks confirmation that under the call completion method proposed by Nokia and approved by the Bureau in the *Nokia Order*, an access attempt is deemed "successfully completed" when the handset receives a voice or traffic channel assignment. Nokia also seeks confirmation that the principles outlined above otherwise comport with the requirements of the *Nokia Order*.

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Thank you for your consideration. I would very much appreciate a response at your earliest convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Pettit", with a long horizontal line extending to the right.

Robert L. Pettit  
Counsel for Nokia, Inc.